

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SEP 29 10 10:50
U.S. DISTRICT COURT
DISTRICT OF MASS

EMORY ZIPPERER

Plaintiff,

vs.

RAYTHEON COMPANY, INC.

Defendant.

Civil Action No. : 03-12379 MLW

**ASSENTED TO MOTION OF PLAINTIFF TO REVISE
STATEMENT FOR LOCAL RULE 16.1 CONFERENCE**

The Plaintiff in the above-referenced matter hereby request an extension of the deadlines for the discovery plan and schedules on the grounds that the parties have been attempting to resolve the case and need additional time to pursue settlement discussions. The Defendant asserts to the following revised plan.

I. DISCOVERY PLAN

The parties propose the following discovery plan:

- A. On or before July 1, 2004: Exchange of documents automatically disclosed.
- B. On or before September 30, 2004: Interrogatories and document requests served.

- C. On or before November 15, 2004: Responses to Interrogatories and document requests due, with documents to be produced by December 1, 2004.
- D. On or before January 31, 2005: Depositions of parties and fact witnesses completed and related supplemental documents requests, if any, issued.
- E. On or before February 28, 2005: Expert witness depositions (if any) and requests for admissions served.

II. PROPOSED SCHEDULE FOR FILING OF MOTIONS

- A. Dispositive motions to be filed by March 1, 2005; and
- B. Replies to be filed by April 15, 2005.

III. PRETRIAL CONFERENCE

Parties expect that the case will be ready for a final pretrial conference in May 1, 2005.

IV. CERTIFICATION OF COUNSEL AND PARTIES

Certifications are forthcoming.

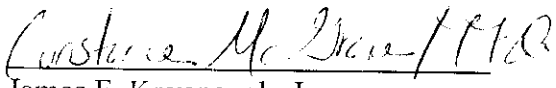
V. OTHER MATTERS


The Plaintiff has consented to trial by a Magistrate Judge. The Defendant has not.
The parties are aware of no other agenda items that must be discussed at the Rule 16.1
conference other than those described above.

Respectfully submitted,

Assented to:
RAYTHEON COMPANY
By its Attorney,

EMORY ZIPPERER
By his Attorney,


James F. Kavanaugh, Jr.
B.B.O. No.: 262360
Constance M. McGrane
B.B.O. NO.: 546745
CONN KAVANAUGH ROSENTHAL
PEISH & FORD, LLP
Ten Post Office Square
Boston, MA 02109
(617) 482-8200
Dated:


Joseph P. Dever
B.B.O. No.: 564237
Theresa Finn Dever
B.B.O. NO.: 564319
RILEY & DEVER, P.C.
210 Broadway, Suite 201
Lynnfield, MA 01940
Tel.: (781) 581-9880

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above
document was served upon the attorney of
record for each other party by mail (by hand)
on 9/29/04

